

OFFICE OF THE GENERAL COUNSEL  
Claudia E. Aguayo, General Counsel (SBN 8351)  
Frank Z. LaForge, Assistant General Counsel (SBN 12246)  
Scott H. Husbands, Assistant General Counsel (SBN 11398)  
University of Nevada, Reno  
1664 N. Virginia Street/MS0550  
Reno, Nevada 89557-0550  
(775) 784-3493  
(775) 327-2202 fax  
caguayo@unr.edu  
flaforge@unr.edu  
shusbands@unr.edu

Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DAHLIA DWEDAR,

Plaintiff,

v.

STATE OF NEVADA EX REL. BOARD OF  
REGENTS OF THE NEVADA SYSTEM OF  
HIGHER EDUCATION, ON BEHALF OF  
THE UNIVERSITY OF NEVADA RENO,

Defendant.

Case No. 3:24-CV-00583-MMD-CLB

**[PROPOSED ORDER] AND**  
**STIPULATION REGARDING TIME TO**  
**FILE RESPONSIVE PLEADING**  
**(First Request)**

Plaintiff Dahlia Dwedar (“Plaintiff”) appearing through counsel of record Trevor J. Hatfield, Esq., Defendant Board of Regents of the Nevada System of Higher Education on behalf of the University of Nevada, Reno (“UNR”) appearing through counsel of record Claudia E. Aguayo, Esq., Frank Z. LaForge, Esq. and Scott H. Husbands, Esq., hereby stipulate that UNR shall have up to and including March 21, 2025 to file its responsive pleading to Plaintiff’s

1 Complaint. In support of their stipulation, the Parties provide the following pursuant to and in  
2 compliance with LR IA 6-1, LR IA 6-2, and LR 7-1:

- 3 1. Plaintiff filed her Complaint on December 17, 2024. (ECF No. 1)
- 4 2. Plaintiff served UNR on February 4, 2025. (ECF No. 7) Under FRCP 12, assuming  
5 service was complete, UNR's responsive pleading would have been due on February  
6 25, 2025.
- 7 3. On February 24, 2025, UNR's counsel reached out to Plaintiff's counsel to discuss a  
8 proposed extension of two weeks. UNR's need for the extension was largely based  
9 on counsel of record in this matter being occupied with another lawsuit in federal  
10 court. That issue, and other pre-existing professional obligations, left UNR without  
11 the time it needed to prepare and file its responsive pleading. Plaintiff's counsel  
12 agreed to the request for a continuance and counsel stipulated to request a two-week  
13 extension. Following counsel's agreement on a two-week stipulation, UNR  
14 discovered that Plaintiff had not filed a necessary affidavit of service showing  
15 service on the Office of the Attorney General. UNR's counsel reached out to  
16 Plaintiff's counsel to advise of the issue and that no responsive pleading was due  
17 because it appeared service was incomplete. Plaintiff filed the necessary affidavit of  
18 service on February 26 but did not reach out to UNR's counsel regarding the filing.  
19 UNR did not discover that the affidavit was filed until March 10, 2025. At that time,  
20 UNR's counsel reached out to Plaintiff's counsel to discuss a new responsive  
21 pleading deadline. Counsel agreed that UNR would have up to and including March  
22 21, 2025 to file its responsive pleading.

23 /

24 /

25 /

26 /

27 /

- 1 4. This is the Parties' first stipulation to extend the time for UNR to file its responsive  
2 pleading.
- 3 5. The Parties therefore request that UNR have up to and including March 21, 2025 to  
4 submit its responsive pleading to Plaintiff's Complaint.
- 5 6. The Parties offer this stipulation in good faith and not for the purpose of delay.

6 STIPULATED and DATED this 12th day of March, 2025.

7  
8 /s/ Trevor J. Hatfield

9 Trevor J. Hatfield (SBN 7373)  
10 Hatfield & Associates, Ltd.  
11 703 S. 8<sup>th</sup> Street  
12 Las Vegas, Nevada 89101  
(702) 388-4469  
(702) 386-9825 fax  
thatfield@hatfieldlawassociates.com

13 **Attorney for Plaintiffs**

/s/ Scott H. Husbands

Claudia E. Aguayo (SBN 8351)  
Frank Z. LaForge (SBN 12246)  
Scott H. Husbands (SBN 11398)  
Office of the General Counsel  
University of Nevada, Reno  
1664 N. Virginia Street/MS0550  
Reno, Nevada 89557-0550  
(775) 784-3493  
(775) 327-2202 fax  
caguayo@unr.edu  
flaforge@unr.edu  
shusbands@unr.edu

**Attorneys for Defendant**

14  
15  
16  
17  
18 **IT IS SO ORDERED.**

19  
20  
21 UNITED STATES MAGISTRATE JUDGE

22  
23 DATED: \_\_\_\_\_  
24  
25  
26  
27  
28